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13 **UNITED STATES DISTRICT COURT**
 14 **NORTHERN DISTRICT OF CALIFORNIA**

15 IN RE: JUUL LABS, INC., MARKETING,
 16 SALES PRACTICES, AND PRODUCTS
 17 LIABILITY LITIGATION

18 THIS DOCUMENT RELATES TO:

19 *Cole Aragona v. Juul Labs, Inc., et al.*,
 20 Case No. 3:20-cv-1928;
 21 *Jordan Dupree v. JUUL LABS, INC., et al.*,
 22 Case No. 3:20-cv-03850;
 23 *Kaitlyn Fay v. JUUL LABS, INC., et al.*,
 24 Case No. 3:19-cv-07934;
 25 *Jennifer Lane v. JUUL LABS, INC., et al.*,
 26 Case No. 3:20-cv-04661;
Bailey Legacki v. JUUL LABS, INC., et al.,
 Case No. 3:20-cv-01927;
Walker McKnight v. JUUL LABS, INC., et al.,
 Case No. 3:20-cv-02600;
Carson Sedgwick v. JUUL LABS, INC., et al.,
 Case No. 3:20-cv-03882;
Ben Shapiro v. JUUL LABS, INC., et al.,
 Case No. 3:19-cv-07428; and
Matthew Tortorici v. JUUL LABS, INC., et al., Case No. 3:20-cv-03847

Case No. 3:19-md-02913-WHO

DECLARATION OF MICHAEL J. GUZMAN IN SUPPORT OF ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIAL SHOULD BE SEALED

1 | I, MICHAEL J. GUZMAN, declare:

2 1. I am a partner at the law firm of Kellogg, Hansen, Todd, Figel & Frederick,
3 P.L.L.C., and counsel to Defendants Hoyoung Huh, Nicholas Pritzker, and Riaz Valani (the “Non-
4 Management Directors”). I am admitted to practice before this Court *pro hac vice*. I make this
5 declaration based on my own personal knowledge. If called upon to testify, I could and would
6 testify competently to the truth of the matters stated herein.

7 2. I submit this Declaration in accordance with Civil Local Rule 79-5 in support of the
8 Administrative Motion to Consider Whether Another Party's Material Should Be Sealed.

9 3. In addition to this Declaration, attached to the Administrative Motion to Consider
10 Whether Another Party's Material Should Be Sealed are the following:

11 a. A true and correct copy of Exhibit A: Plaintiff's Second Supplemental and
12 Amended Responses to Defendant JUUL Lab Inc.'s First Set of
13 Interrogatories to Plaintiff Cole Aragona;
14 b. A true and correct copy of Exhibit B: Plaintiff's Second Supplemental and
15 Amended Responses to Defendant JUUL Lab Inc.'s First Set of Requests
16 for Production of Documents to Plaintiff Cole Aragona; and
17 c. A true and correct copy of Exhibit C: Plaintiff Cole Aragona's Amended
18 Plaintiff Fact Sheet.

20 I declare under penalty of perjury that the foregoing is true and correct. Executed this
21 22nd day of January, 2025, in Washington, D.C.

/s/ Michael J. Guzman
Michael J. Guzman